

Self-Assessment of Natural Gas and Hazardous Liquid Pipeline Operator Public Awareness Programs

Introduction

This self-assessment is designed to:

- a) Determine if the operators of gas and hazardous liquid pipelines will meet the requirements of the Pipeline Safety Improvement Act of 2002 (PSIA), and
- b) Help those operators evaluate their existing programs against the guidelines provided in the new industry consensus standard, API Recommended Practice (RP) 1162.

Part A: Compliance with the Pipeline Regulations and the PSIA 2002

The Pipeline Safety Improvement Act of 2002 (PSIA 2002) requires that each owner or operator of a natural gas or hazardous liquid pipeline facility must carry out a continuing program to educate the public on the use of a one-call notification system prior to excavation and other damage prevention activities, the possible hazards associated with unintended releases from the pipeline facility, the physical indications that such a release may have occurred, what steps should be taken for public safety in the event of a pipeline release, and how to report such an event.

The PSIA also requires that by December 17, 2003 (not later than 12 months after the date of its enactment), each owner or operator of a gas or hazardous liquid pipeline facility must review its existing public education program for effectiveness and modify the program as necessary.

Part A of this Self-Assessment inquires about the operator's existing public education program relative to the regulatory requirements found in 49 CFR Parts 192 and 195 and relative to the public education requirements found in the PSIA 2002, as noted above.

Part B: Operator Self-Assessment to RP1162 Guidelines

In recognition of the importance of effective public awareness programs, outstanding recommendations from the National Transportation Safety Board (NTSB) and anticipated legislative action in this regard, a pipeline industry Task Force has developed and issued consensus standard, API Recommended Practice (RP) 1162, "Public Awareness Programs for Pipeline Operators".

RP 1162 provides guidance on development, implementation, and evaluation of public awareness programs. *Note that "public education programs", as used in the PSIA, and "public awareness programs", as used in RP 1162, are considered the same and used interchangeably for the purposes of this assessment form.*

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RP 1162 provides guidance for:

- Intrastate and interstate hazardous liquid pipelines,
- Intrastate and interstate natural gas transmission and distribution pipelines, and
- Gathering pipelines.

The RP 1162 Task Force was composed of representatives from natural gas and liquid petroleum transmission companies, local distribution companies, and gathering systems, together with the respective trade associations. Additionally, feedback from local public officials, the public and interested parties was solicited. Representatives from OPS and the National Association of Pipeline Safety Representatives (NAPSR) observed and provided input into the development of the standard.

The guidance provided in RP 1162 is intended for use by pipeline operators in developing and implementing public awareness programs associated with the normal operation of existing pipelines. The guidance is not intended to focus on public awareness activities appropriate for new pipeline construction or for communications that occur immediately after a pipeline-related emergency. The RP is also not intended to provide guidance to operators for communications about operator-specific performance measures that are addressed through other means of communication or regulatory reporting.

Part B of this self-assessment will support pipeline operators in evaluating their current public awareness programs against the guidelines provided in RP 1162 and in planning modifications to align their programs with those guidelines.

Looking Forward: Regulatory Implications

The Office of Pipeline Safety has announced its intent to incorporate the guidance provided in RP 1162 in whole or part into the pipeline safety regulations. The aggregate statistics resulting from operator responses to Part B of this self-assessment will provide the OPS with statistical information regarding the status of public education programs across and within the pipeline industry and an outlook of operator plans to achieve full alignment with the baseline guidance provided in RP 1162.

This self-assessment is to be completed by all operators of hazardous liquid, natural gas transmission, natural gas distribution, and gathering pipeline systems and submitted to the U.S. Department of Transportation, Research and Special Programs Administration, Office of Pipeline Safety no later than December 17, 2003.

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{The following information to be confirmed:}

Please complete and submit this self-assessment online. You may also <[download a file](#)> of the self-assessment form and complete it offline. Forms completed offline can be submitted to OPS via fax or as Email attachments. Send the completed form to:

Fax: 202-366-4566

Email: juan.martinez@rspa.dot.gov

OPS Contact for confirmation of receipt:

{name} Juan Carlos Martinez

{phone} 202-366-1933

**Self-Assessment of Natural Gas and Hazardous Liquid Pipeline Operator
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1. Operator Contact Information

Operator Name.....:	
Responsible Contact Person Regarding This Self-Assessment:	
• Name.....:	
• Phone.....:	
• Company Email.....:	
• Fax (optional).....:	

{ **Online Privacy Policy Statement** }

2. Scope of This Assessment

An operator may have a single, overall public awareness program for all of its pipeline assets. Smaller companies and LDCs particularly may have just one overall program. Within the requirements and internal guidelines of its program, an operator may develop and implement multiple public awareness plans based on the configuration and mix of its systems and assets. These separate plans may be specific, for example, to one or more pipeline systems, segments, or facilities or they may be based on separation by geographic areas.

Conversely, an operator may have multiple public awareness programs, each administered with different requirements and internal guidelines. This could be the result, for example, of the company being a composite of different individual business units. Each of these multiple programs might contain different and unique requirements for the development and implementation of public awareness program plans.

This self-assessment is intended to address a single public awareness *program*. If the operator has multiple public education programs in use, a separate self-assessment must be completed for each *program*.

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Please respond to the following questions:

- (2.a) Does the operator have more than just one overall public education/awareness program? ☐ **Yes** ☐ **No**
- (2.b) If so, how many separate public education programs does the operator have?
☐ - 2 ☐ - 3 ☐ - **Greater than 3**
- (2.c) If so, will separate self-assessments be completed for each of the operator's asset-specific public education programs? ☐ **Yes** ☐ **No**

2.1 Systems Identification

In the table below, identify the pipeline systems for which this public education program operator self-assessment applies. Identify the Operator ID and Name for each pipeline system separately. Indicate whether each system is hazardous liquid, gas transmission, gas distribution, or gathering system that includes OPS-regulated pipelines. Add additional lines if necessary.

Operator ID #	Operator Name/System Name	System Type
<i>Example: 31174</i>	<i>Shell Pipeline Co., L.P.</i>	<i>Liquid</i>
<i>Example: 31425</i>	<i>Enbridge Pipelines (Texas Gathering) Inc.</i>	<i>Gas Gathering</i>
<i>Example: 13480</i>	<i>Niagara Mohawk Power Corp</i>	<i>Gas Distribution</i>

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Part A – Compliance with the Pipeline Regulations and the PSIA 2002

3. Educational Program Requirements

3.1	Is the operator aware of the current requirements found in 49 CFR 195 and 49 CFR 192 (as applicable) for carrying out public education programs? <input type="checkbox"/> Yes <input type="checkbox"/> No
3.2	<p>(a) Does the operator currently carry out a continuing educational program as required by 49 CFR Parts 192 and 195? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If "Yes", does the program enable the following audiences to recognize a pipeline emergency and to report it to the operator or the fire, police, or other appropriate public officials:</p> <p>(b) Public? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>(c) Appropriate government organizations? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>(d) Persons engaged in excavation-related activities? <input type="checkbox"/> Yes <input type="checkbox"/> No</p>
3.3	Is the operator aware of the public education program requirements found in the Pipeline Safety Improvement Act of 2002 (PSIA 2002)? <input type="checkbox"/> Yes <input type="checkbox"/> No
3.4	<p>Does the operator currently carry out a continuing education program to educate the public on:</p> <p>(a) Use of a one-call notification system prior to excavation? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>(b) Damage prevention activities other than use of the one-call notification system? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>(c) Possible hazards associated with unintended releases from the pipeline facility? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>(d) Physical indications that such a release may have occurred? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>(e) What steps should be taken for public safety in the event of a pipeline release? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>(f) How to report an event such as a pipeline release? <input type="checkbox"/> Yes <input type="checkbox"/> No</p>

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3.5	<p>Is the operator aware of the statutory requirement in the PSIA 2002 that by December 17, 2003 (not later than 12 months after the date of its enactment), each owner or operator of a gas or hazardous liquid pipeline facility must review its existing public education program for effectiveness and modify the program as necessary.</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
3.6	<p>Relative to the requirements of the PSIA 2002:</p> <p>(a) Has the operator conducted an initial evaluation of its public education program for effectiveness in response to the PSIA 2002? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>(b) If so, were modifications to the program deemed necessary? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>(c) If so, has the operator begun making modifications to its public education program? <input type="checkbox"/> Yes <input type="checkbox"/> No</p>

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Part B – Operator Self-Assessment to RP1162 Guidelines

Note: This portion of the self-assessment should be completed regarding the operator's public education/awareness program indicated in Part A, Questions 3.2 and/or 3.5, above. *If the operator does not currently have a public education/awareness program (i.e., if all answers to Questions 3.2 and 3.5 above were "No"), then proceed to Question 7, below.*

RP 1162 is just being issued as an industry consensus guideline, thus it is anticipated that many existing public education/awareness programs will not yet be fully aligned with the RP 1162 guidelines.

4. Program Goals/Objectives and Administration

Full organizational support and clear goals and objectives can make a significant difference in the way the operator's public awareness program is received and if the program will ultimately succeed.

4.1	Does the operator's public awareness program have defined and documented management objectives? <input type="checkbox"/> Yes <input type="checkbox"/> No
4.2	RP 1162 states objectives for public awareness programs. Does the operator's program strive to support the following objectives: (a) Raise the awareness of stakeholders to the presence of pipelines in their community? <input type="checkbox"/> Yes <input type="checkbox"/> No (b) Raise the awareness of stakeholders in understanding of the role of pipelines in transporting energy? <input type="checkbox"/> Yes <input type="checkbox"/> No (c) Help the public understand that while pipeline accidents are possible, pipelines are a relatively safe mode of energy transportation? <input type="checkbox"/> Yes <input type="checkbox"/> No (d) Help the public understand that pipeline operators undertake a variety of measures to prevent pipeline accidents? <input type="checkbox"/> Yes <input type="checkbox"/> No (e) Help the public understand that pipeline operators anticipate and plan for management of accidents if they occur? <input type="checkbox"/> Yes <input type="checkbox"/> No (f) Help the public understand the steps that the public can take to prevent and respond to pipeline emergencies? <input type="checkbox"/> Yes <input type="checkbox"/> No

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4.3	<p>Is organizational support for the operator's public awareness program demonstrated?</p> <p>(a) Management support for the program is:</p> <div style="display: flex; align-items: center;"> <div style="margin-right: 20px;"> <input type="checkbox"/> 1 High <input type="checkbox"/> 2 <input type="checkbox"/> 3 Medium <input type="checkbox"/> 4 <input type="checkbox"/> 5 Low </div> <div style="font-size: 4em; line-height: 1;">}</div> <div style="border: 1px solid black; padding: 5px; flex-grow: 1;"> Choose only one; multiple choices will be counted as "Low" </div> </div> <p>(b) Is the program documented in company policies and procedures? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>(c) Are the positions responsible for program administration designated? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>(d) Are the roles and responsibilities of each position with responsibility for program implementation documented? <input type="checkbox"/> Yes <input type="checkbox"/> No</p>
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5. Baseline Program Scope and Implementation

Audience Scope & Identification	
<i>RP 1162 addresses four primary stakeholder audiences: Affected Public, Local Public Officials, Emergency Officials and Excavators.</i>	
5.1	<p>Does the operator's public awareness program address the four audiences identified in RP 1162?</p> <p>(a) Affected Public? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>(b) Local Public Officials? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>(c) Emergency Officials? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>(d) Excavators? <input type="checkbox"/> Yes <input type="checkbox"/> No</p>

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5.2	<p>(a) Does the program documentation establish communication coverage areas (e.g., corridor width and distance) relative to pipeline assets included in the program? (For example, does it define the perpendicular distance along the pipeline that should be used to determine the affected audience?) <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If so, what is the coverage area specified? (check all that apply)</p> <p>(b) <input type="checkbox"/> - LDC Customers</p> <p>(c) <input type="checkbox"/> - Residents located along distribution systems</p> <p>(d) <input type="checkbox"/> - Residents located adjacent to transmission pipeline ROW</p> <p>(e) <input type="checkbox"/> - Residents located on gathering system ROW</p> <p>(f) <input type="checkbox"/> - 1/8 mile on either side of ROW</p> <p>(g) <input type="checkbox"/> - Greater than 1/8 mile on either side of ROW</p> <p>(h) <input type="checkbox"/> - Other (describe):</p>
5.3	<p>Does the program documentation establish methods to be used to identify the appropriate members of each stakeholder audience? (For example, does it establish how to determine the lists of addresses of residents living along the pipeline or how to contact excavators to which communication efforts should be addressed?)</p> <p align="center"><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p align="center">Communication Messages, Frequency and Methods</p> <p><i>RP 1162 establishes baseline messages, delivery frequencies and methods to be used by the operator in communicating with each audience type.</i></p>	
5.4	<p>Does the operator's program establish guidance regarding the <i>content</i> (i.e., the key messages) to be communicated to each audience? <input type="checkbox"/> Yes <input type="checkbox"/> No</p>
5.5	<p>Does the program establish a baseline delivery <i>frequency</i> for communicating to each audience? <input type="checkbox"/> Yes <input type="checkbox"/> No</p>
5.6	<p>Does the program establish <i>methods</i> to be used in communicating with each different stakeholder audience? <input type="checkbox"/> Yes <input type="checkbox"/> No</p>

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Program Planning, Implementation and Documentation	
<i>Funding and resource requirements for an operator's public awareness program development and implementation will vary according to the program's objectives, design, and scope.</i>	
5.7	<p>(a) Does the program require periodic development and documentation of a program plan? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>(b) If so, does it require the identification of resource requirements? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>(c) If development of a program plan is required, what is the length of the period between the developments of new program plans? <input type="checkbox"/> - 1 year <input type="checkbox"/> - 2 years <input type="checkbox"/> - 3 years <input type="checkbox"/> - Greater than 3 years</p>
5.8	Is the operator's program being implemented in accordance with documented program plans and requirements? <input type="checkbox"/> Yes <input type="checkbox"/> No
5.9	<p>Are documented records of the operator's actual program implementation developed and maintained, including:</p> <p>(a) Are the target audiences to which communications were actually directed identified in the records? (For example, are the addresses to which communications were actually sent for the Affected Public audience documented? Similarly, for example, are the lists of excavators to whom communications were actually directed documented?) <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>For each stakeholder audience, was the actual program implementation documented such that the following information was recorded:</p> <p>(b) Actual <i>message type and content</i> (including copies of printed materials distributed)? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>(c) Actual delivery <i>frequencies</i>? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>(d) Actual delivery <i>methods</i>? <input type="checkbox"/> Yes <input type="checkbox"/> No</p>

6. Program Evaluation and Improvement

Program Effectiveness
<i>A program evaluation plan should include the measures, means and frequency for tracking performance. The selected set of measures should reflect:</i>

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- *Whether the program is being implemented as planned - **the process**.*
- *Whether the program is effective - **program effectiveness**.*

Based on the results of the evaluation addressing these two questions, the operator may need to make changes in its program implementation process, stakeholder identification effort, messages, and methods of delivery and/or frequency.

6.1 (a) Does the operator's public awareness program require periodic assessments to determine if it is being implemented as planned? ☐ **Yes** ☐ **No**

If so, how are such assessments performed? (check all that apply)

- (b) ☐ - Internal self-assessments
- (c) ☐ - Third-party audits
- (d) ☐ - Regulatory inspections
- (e) ☐ - Other (describe):

6.2 (a) Does the program require periodic assessments to determine if the program, as actually implemented, is effective? ☐ **Yes** ☐ **No**

(b) If so, how frequently are such assessments for program effectiveness required to be performed?

- ☐ - **1 year** ☐ - **2 years** ☐ - **3 years** ☐ - **Greater than 3 years**

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6.3	<p>(a) Does the program establish internal guidelines for conducting assessments for effectiveness? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If so, what aspects of the program are measured to assess whether the program is effective?</p> <p>(b) <input type="checkbox"/> - Is the information reaching the intended stakeholder audiences?</p> <p>(c) <input type="checkbox"/> - Are the recipient audiences understanding the messages delivered?</p> <p>(d) <input type="checkbox"/> - Are the recipients motivated to respond appropriately in alignment with the information provided?</p> <p>(e) <input type="checkbox"/> - Is implementation of the program impacting bottom line results (for example, a reduction in third-party damages)?</p> <p>(f) <input type="checkbox"/> - Other (describe):</p> <p>(g) Give examples of the specific measures being used (e.g., number or percentage of individuals actually reached in a specific audience, number of telephone inquiries to operator, number of bounce-back card replies received, number of officials in attendance at emergency drills, etc.)</p> <p>(h) Does the program establish requirements or internal guidelines for incorporating assessment findings into modifications to the program as necessary?</p> <p> <input type="checkbox"/> Yes <input type="checkbox"/> No</p>
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6.4	<p>What methods, if any, are used to solicit data to determine if the program is being implemented appropriately and if the operator's public awareness efforts are effective? (Check all that apply.)</p> <p>(a) <input type="checkbox"/> - none</p> <p>(b) <input type="checkbox"/> - solicitation of input from pipeline personnel</p> <p>(c) <input type="checkbox"/> - targeted audience surveys (e.g., affected public, local public officials, emergency officials, excavators)</p> <p>(d) <input type="checkbox"/> - focus groups</p> <p>(e) <input type="checkbox"/> - bounce-back reply cards</p> <p>(f) <input type="checkbox"/> - meetings with stakeholders</p> <p>(g) <input type="checkbox"/> - other (describe):</p>
6.5	<p>Does the operator's evaluation process/plan include making use of evaluations, in whole or part, sponsored by industry groups or other operators in the region or that otherwise apply? (For example, the operator might use the results of an industry association sponsored survey if the methodology, scope, and target audiences used by those evaluations apply to the operator's program.)</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
6.6	<p>Program assessment results may suggest the need for changes or enhancements in audience identification or outreach, message type or content, delivery methods and/or frequency. Does the program require that program changes be documented to describe their nature and the basis for why the modifications were needed?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>

7. No Current Program

If the operator does not currently have a public education/awareness program (i.e., if all answers to Questions 3.2 and 3.5 above were "No"), how long is expected before a program will be fully developed and implemented?

☐ - 1 year ☐ - 2 years ☐ - 3 years ☐ - Greater than 3 years

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